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8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 JOHN DOE,

12 Plaintiff,

13 v.

14 DEPARTMENT OF JUSTICE OF THE STATE
15 OF CALIFORNIA, STATE OF CALIFORNIA,
16 CITY OF SUNNYVALE, OFFICER JOHN
BOGNANNO, and DOES 1 to 50,

17 Defendants.

NO.: 22cv08685- BLF

**STIPULATED PROTECTIVE
ORDER ALLOWING JOHN DOE
TO PROCEED USING A
PSEUDONYM AND REQUIRING
THE PARTIES TO FILE
DOCUMENTS REVEALING HIS
TRUE IDENTITY WITH
APPROPRIATE REDACTIONS**

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**STIPULATION AND PROTECTIVE ORDER RE: USAGE
OF DOE IDENTIFIER**

22cv08685- BLF

1 IT IS HEREBY STIPULATED AND AGREED, by the undersigned attorneys for the
2 respective parties, that Plaintiff John Doe may proceed in the above-captioned case using a
3 pseudonym. Mr. Doe has requested this accommodation because he was accused of committing a
4 misdemeanor requiring sex offender registration but the charges were later dismissed.

5 It is further agreed that all documents filed in this case which reference or refer to John
6 Doe's true identity or identifying information shall be redacted in order to protect John Doe's
7 reputation. The information to be redacted is as follows: name, date of birth, social security
8 number, current address, past addresses, and the case number of any state court criminal
9 proceeding or California Tort Claims Act claim form.

10 This stipulated protective order applies to: any pleading, motion, declaration, affidavit, or
11 exhibit filed in this case.

12 Plaintiff has informed Defendants of John Doe's true identity. In order to protect John
13 Doe's reputation, the parties agree that any document revealing his identity will be redacted, with
14 an unredacted copy emailed (the same day) to the Court and all parties.

15 This protective order shall be without prejudice as to the right of any party to oppose
16 production of any information or object to its admissibility into evidence.

17 If either party believes a document has been redacted improperly, the parties will make
18 good faith efforts to resolve the issue without the assistance of the Court. In the event the parties
19 cannot resolve the dispute, the party disputing the use of redaction may file a motion to remove
20 redactions.

21 The parties agree to make all good faith best efforts to carefully review all documents filed
22 in this case or used at trial to ensure that any identifying information is appropriately redacted.
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1 After the termination of this case, the provisions of this protective order shall continue to be
2 binding.

3 SO STIPULATED.

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5 Dated: April 27, 2023

/s/ MICHAEL MILLEN
MICHAEL MILLEN, ESQ.

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8 ROB BONTA
Attorney General of California
9 CATHERINE WOODBRIDGE
Supervising Deputy Attorney General

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11 Dated: April 27, 2023

12 /s/ AMY W. LO
AMY W. LO
13 Deputy Attorney General
Attorneys for State of California
14 acting by and through the
Department of Justice

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16 ALLEN, GLAESSNER,
17 HAZELWOOD & WERTH, LLP

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19 Dated: April 27, 2023

20 /s/ KEVIN ALLEN
KEVIN P. ALLEN
21 Attorneys for Defendant
CITY OF SUNNYVALE AND
22 OFFICER
JOHN BOGNANNO

ORDER

Finding that the public will not be prevented from observing this Court's proceedings or rulings by implementation of the parties' stipulated protective order, it is ORDERED that the above stipulated protective order go into effect immediately.

Dated: April 28, 2023



BETH LABSON FREEMAN
UNITED STATES DISTRICT COURT JUDGE